



BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

615 214-6301
Fax 615 214-7406

Guy M. Hicks
General Counsel

NOV 5 07 11 32

November 5, 1997

VIA HAND-DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37238

Re: *Universal Service Generic Contested Case*
Docket No. 97-00888

Dear Mr. Waddell:

Enclosed for filing in the above-referenced matter on behalf of BellSouth Telecommunications, Inc. ("BellSouth") are BellSouth's Responses to the Discovery Requests of AT&T Communications of the South Central States, Inc. ("AT&T"). Although BellSouth has responded to these requests, BellSouth does not believe that AT&T is entitled to such discovery at this juncture.

The issue of discovery was extensively discussed by the parties at the Technical Workshop on October 14, 1997. It was the position of BellSouth, as well as other parties, that discovery on Phase 1 issues was unnecessary. AT&T and the Consumer Advocate were the only parties that wanted to reserve the right to conduct discovery to the extent it was appropriate. The parties agreed that if any party believed discovery was necessary on Phase 1 issues, it would be required to say so in comments to be filed with the TRA on October 21 and to identify the discovery that the party believed was necessary. This agreement was reached at the suggestion of AT&T's counsel. As Mr. Sanford explained:

Now, whether or not there should be any discovery with respect to any policy issue, as I said initially I don't know that we would want to seek any. I am somewhat hesitant to take the position at this point that there should be none. I think that perhaps the best way to do it would be to have the parties indicate in their filing a week from now

Mr. David Waddell
November 5, 1997
Page 2

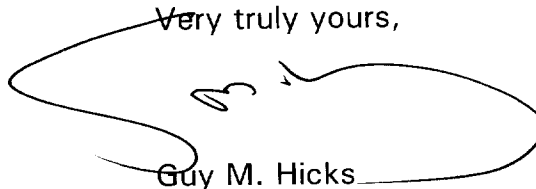
whether they want discovery on any issue and what that issue is and what kind of discovery they want and then the Authority can decide because it is within the Authority's power to decide. There's not, in this agency, an absolute right to discovery, the Authority can decide whether to all that discovery.

(Oct. 14, 1997 Tr. at 30). All the other parties were amenable to Mr. Sanford's proposal, which he later reiterated when he remarked that those parties seeking discovery should "say what they want on October 21." (*Id.* at 39.) Although the staff proposed that discovery dates be included in the schedule as a precaution, it was explicitly understood that discovery would not take place unless a party indicated in its comments what discovery was necessary and the TRA agreed.

In its comments filed on October 21, AT&T did not identify any issues in Phase 1 of this proceeding upon which discovery was necessary. Furthermore, at the Special Conference on October 30, 1997, counsel for AT&T did not indicate any desire for discovery. Instead, AT&T simply served interrogatories on BellSouth and other parties in complete disregard of the agreement that had been reached at the Technical Workshop.

Under the circumstances, AT&T's discovery requests are improper. However, because of the tight time frames under which the parties are operating and because the vast majority of AT&T's requests are not relevant to the issues presented in Phase I of this docket, BellSouth is responding to AT&T's requests. BellSouth did, however, want you to be aware of the foregoing when reviewing this matter. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to be "Guy M. Hicks", written over a large, loopy, handwritten flourish that extends to the left and right.

Guy M. Hicks

Enclosure

cc: Bennett L. Ross, Esquire
GMH/ba

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 1
Page 1 of 1

REQUEST: Please provide BellSouth's residential total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

RECEIVED
OCT 31 1997
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 2
Page 1 of 1

- REQUEST:** Please provide BellSouth's single line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.
- RESPONSE:** BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 3
Page 1 of 1

REQUEST: Please provide BellSouth's multi-line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 4
Page 1 of 1

REQUEST: For the same period as the data provided above, please provide BellSouth's residential revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 5
Page 1 of 1

REQUEST: For the same period as the data provided above, please provide BellSouth's single line business revenue, separately, obtained interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 6
Page 1 of 1

REQUEST: For the same period as the data provided in Data Request No. 3, please provide BellSouth's multi-line business revenue, separately, obtained interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 7
Page 1 of 1

REQUEST: For the same period, please provide BellSouth's residential revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 8
Page 1 of 1

REQUEST: For the same period, please provide BellSouth's single line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 9
Page 1 of 1

REQUEST: For the same period, please provide BellSouth's multi-line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: BellSouth objects to this request on grounds that the information sought is not relevant to any issue in Phase I of this proceeding or reasonably calculated to lead to the discovery of admissible evidence in Phase I.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 10
Page 1 of 1

REQUEST: Please provide, for the midpoint of the period above, the total amount of the in-service subscriber lines, separately, for residential service, single line business service and multi-line business service. Additionally, provide the quantity of residential in-service subscriber lines that are installed in addition to the first single line at a residence. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

RESPONSE: In response to this request, BellSouth states that the in-service quantities in Tennessee based on billing data as of March 31, 1997 are as follows:

<u>SUBSCRIBER ACCESS LINES BY CATEGORY</u>	<u>IN-SERVICE QUANTITY</u>
Total Residence	1,793,868
Single Line Business	58,412
Multi-Line Business	658,596
Additional Residence (Included In Total Res.)	188,591

REQUEST: Please provide the number of promotions for second residential lines BellSouth has offered in Tennessee since January 1, 1995, the time period each promotion was in effect, and provide the terms of each promotion.

RESPONSE: Since January 1, 1995, BellSouth has conducted five (5) promotions in Tennessee for additional residential lines.

The first promotion was in the spring of 1995. Customers who ordered an additional residence line during the promotional period (April 1 through May 31, 1995) received an \$18 credit that could be applied to the customer's local telephone bill or used to purchase certain merchandise.

The second promotion was in the fall of 1995. Customers who ordered an additional residence line during the promotional period (November 1 through December 31, 1995) received an \$18 credit that could be applied to the customer's local telephone bill or used to purchase certain merchandise.

The third promotion was in the spring of 1996. Customers who ordered an additional residence line during the promotional period (April 1 through May 31, 1996) received an \$18 credit that could be applied to the customer's local telephone bill or used to purchase certain merchandise.

The fourth promotion was in the fall of 1996. Customers who ordered an additional residence line during the promotional period (November 1 through December 31, 1996) received an \$18 credit that could be applied to the customer's local telephone bill or used to purchase certain merchandise.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 11
Page 2 of 2

The fifth promotion was in the spring of 1997. Customers who ordered an additional residence line during the promotional period (April 1 through May 31, 1997) received a \$40 credit that could be applied to the customer's local telephone bill or used to purchase certain merchandise. This promotion required a minimum service period of six months.

BellSouth Telecommunications, Inc.
TRA Docket 97-00888
AT&T's First Data Request
Dated October 31, 1997
Item No. 12
Page 1 of 1

REQUEST: For each of the promotions identified in Item 11, please provide the number of new second lines purchased by subscribers.

RESPONSE: The number of additional residential lines that were ordered during the promotional periods referenced in the foregoing Data Request is as follows:

<u>Year</u>	<u>April</u>	<u>May</u>	<u>Nov.</u>	<u>Dec.</u>
1995	5912	6916	7306	8953
1996	8920	9321	8820	9739
1997	10870	11685		

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 1997, a copy of the foregoing document was served on the parties of record, via U. S. Mail, postage pre-paid, addressed as follows:

Don Baltimore, Esquire
Farrar & Bates
211 7th Ave., N., #320
Nashville, TN 37219-1823

Mr. Thomas J. Curran
Director External Affairs
360 Communications Co.
8725 W. Higgins Road
Chicago, IL 60631

Richard Smith
President
Standard Communications Co.
302 Sunset Dr., #101
Johnson City, TN 37604

Ms. Nanette Edwards
Regulatory Affairs Manager
Deltacom, Inc.
700 Blvd. South, #101
Huntsville, AL 35802

W. T. Sims
Manager
Yorkville Telephone Cooperative
Yorkville, TN 38389

Glen B. Sears
General Manager
West Kentucky Rural Telephone Coop.
237 N. 8th St.
Mayfield, KY 42066

Carolyn Tatum-Roddy, Esq.
Sprint Communications Co., LP
3100 Cumberland Circle
Atlanta, GA 30339

James P. Lamoureux
AT&T
1200 Peachtree St., NE, #4068
Atlanta, GA 30367

Guilford Thornton, Esquire
Stokes & Bartholomew
424 Church Street, #2800
Nashville, TN 37219

T. G. Pappas
Bass, Berry & Sims
2700 First American Center
Nashville, TN 37238

Richard M. Tettlebaum
Citizens Communications
1400 16th St., NW, #500
Washington, DC 20036

Vincent Williams, Esq.
Office of the Attorney General
Consumer Advocate Division
426 Fifth Ave., N., 2nd Fl.
Nashville, TN 37243-0500

William C. Carriger, Esquire
Strang, Fletcher
One Union Sq., #400
Chattanooga, TN 37402

Dan H. Elrod, Esquire
Trabue, Sturdivant, et al.
511 Union St., #2500
Nashville, TN 37219-1738

Jon Hastings, Esquire
Boult, Cummings, et al.
414 Union St., #1600
Nashville, TN 37219

Henry M. Walker, Esquire
Boult, Cummings, et al.
414 Union St., #1600
Nashville, TN 37219

Dana Shaffer, Esquire
NEXTLINK
105 Malloy Street, #300
Nashville, TN 37201

Richard Cys
Davis, Wright Tremaine
1155 Connecticut Ave., NW, #700
Washington, DC 20036

Daniel M. Waggoner
Davis Wright Tremaine
1501 Fourth Ave., #2600
Seattle, WA 98101-1684

Charles B. Welch
Farris, Mathews, et al.
511 Union St., #2400
Nashville, TN 37219

Hubert D. Dudney
General Manager
Twin Lakes Telephone Co.
P. O. Box 67
Gainesboro, TN 38562

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

Dennis McNamee, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

Wayne Gassaway, Manager
DeKalb Telephone Cooperative, Inc.
P. O. Box 247
Alexandria, TN 37012

Phoenix Network
Attn: Denise Newman
1687 Cole Blvd.
Golden, CO 80401

Jane Walters, Commissioner
Department of Education
710 James Robertson Pkwy, 6th Fl.
Nashville, TN 37423-0375

Jack McFadden, Director
Dept. of Finance & Administration
598 James Robertson Parkway
Nashville, TN 37243-0560

Dana Frix, Esquire
Swidler & Berlin
3000 K Street, NW, #300
Washington, DC 20007

F. Thomas Rowland
North Central Telephone. Coop.
P. O. Box 70
Lafayette, TN 370830070

Val Sanford, Esquire
Gullett, Sanford, Robinson & Martin
230 Fourth Ave., N., 3d Fl.
Nashville, TN 37219-8888

D. Billye Sanders, Esquire
P. O. Box 198866
Nashville, TN 37219-8966

Fred L. Terry
General Manager
Highland Telephone Cooper
P. O. Box 119
Sunbright, TN 37872

Michael Romano
Mark Pasko
Swidler & Berlin
3000 K. St., NW, #300
Washington, DC 20007-5116

Proctor Upchurch, Esquire
P. O. Box 3549
Woodmere Mall
Crossville, TN 38557-3549

Sheila Davis
Chaz Taylor, Inc.
3401 West End Ave., #318
Nashville, TN 37203

James W. Dempster, Esquire
Ben Lomand Rural Telephone Co-opp.
P. O. Box 332
McMinnville, TN 37111-0332

A handwritten signature in black ink, appearing to be 'J. W. Dempster', written over a horizontal line.